

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Western Division

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OCT 17 2011

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Keren L. Carter

Plaintiff

vs.
Rock Valley College;

CIVIL CASE NO.

11 C50299

Judge Kapala

Defendant

COMPLAINT

In May 2011 the following Defendants violated my guaranteed Const. Rights established by U.S. Supreme Court Justices under the Fourteenth Amend. of US Constitution by restricting my Access to take Summer classes at Rock Valley College during Summer 2011 term and all other Summer terms because of Plaintiff's Status as an "Sexual Offender" without due Process of Law and discriminatory Practices by each Defendant in violation of Plaintiff's guaranteed Constitutional right under 1st Amendment of U.S. Constitution based on Sexual Preference, Handicap, Religion where Rock Valley has No Set Policy which restricts "Sex Offenders" from attending said college and violates "Their Open Door Policy" which is clearly established by the trustee board. Amy Diaz - V.P. of Student Development violated his due Process rights by "Dropping" his Summer classes before conducting a investigation of Plaintiff's grievances regarding the denial of attending classes where he was registered for night classes during the Summer term when "Whiz Kids" aren't on campus which was the reason for his denial of classes during any Summer term at Rock Valley. Also restricting his Access to "Woodward Technology Center" at the main campus. She "Failed"

to properly investigate each complaint and "failed" to produce any evidence such as the Policies and Procedures which bases her denial that proper procedures were being followed by said Defendants and denied his grievances. MR. Carter again wrote Ms. Diaz and demanded a copy in support of her June 2011 decision and as of October 3, 2011 she has ignored his Complaint/Demand Letter. These practices are still being used even though Plaintiff has an guaranteed right to "due process" which violates his Life, Liberty, and Pursuit of happiness under the 14th Amendment of the U.S. Const. she is being sued in her individual capacity only. (2) When Plaintiff met with Jessie (Guzman) Ouseberry on or about April 25, 2011 she "failed" to explain the procedures in registering for classes where he must be enrolled in (Reading 096) along with a list of courses which only can be taken. She never shown MR. Carter this list or explained this list and only stated you can register in fall 2011 term only. He registered for the Summer term 2011 and registration accepted his classes Math 088 Math 089 and Planning for Success. In May 2011 he was dropped by Amy Diaz, Defendant without any investigation of his grievances without due process. GERRILYNN PERKINS and JOEL IRWIN violated Plaintiff's rights under the 14th Amendment of U.S. Constitution (An guaranteed right) by restricting his access to Summer terms at Rock Valley College which clearly violates the schools "Open Door Policy" by claiming "sex offenders" aren't allowed on main campus during Summer term due to "Whiz Kids" Program during that time and "failed" to show it was an "Security Risk" when his classes were at night when "Whiz Kids" wasn't on campus. Also discriminatory in nature without showing cause in violation of an clearly "Open Door Policy" established in place at the college. Also denying me any access to the "Woodward Technology Center" and Physical Education building which is discriminatory and prejudicial toward the Plaintiff without showing any evidence or policy that clearly is written and is

Available for him to review. There was nothing shown to him and their basis are unjustifiable. This practice caused him over \$5,000 in Punitive Damages (late fees for rent, late fees and turn off of phone services, and Debt Collection calls and Harassment by Creditors. He started the Admissions Process in March 2011 and both Defendants were well aware of his plans to take classes during the Summer term 2011 and he made his plans accordingly to do such. Both Defendants waited until he had already registered for classes and a week before the start of Summer Session I told him he is restricting him from any Summer term classes on main campus to online classes only even though his classes are at night when "Whiz kids" aren't on campus. Both are being sued in their official and individual capacities. Gerlynn - as director of Judicial Affairs and Joab Irwin - Officer of Rock Valley Police in charge of "sex offenders". The Plaintiffs Demands a Jury trial on all Counts - Discriminatory Practices At Rock Valley College which is a Community College with open door Practices/Policies. He demands \$25,000 Plus Court Costs Plus Injunctive / Declaratory Relief. Rock Valley is responsible for set Policies/Procedures to be in place and failed to do so and being sued for Declaratory / Injunctive Relief.

Karen L. Carter
Signature

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